

# COMMUNICATIONS ADVISORY COUNSEL LLC

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July 28, 2006

***Via electronic filing***

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: South Canaan Cellular Communications Company, LP  
CC Docket No. 94-102  
Report due August 1, 2006

Dear Madam Secretary:

Pursuant to the Commission's *Order*,<sup>1</sup> South Canaan Cellular Communications Company, LP ("South Canaan") hereby submits the attached report regarding its progress in meeting the 95% ALI-compliant handset penetration requirement.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,



Sylvia Lesse  
Counsel for South Canaan  
Cellular Communications Company, LP

cc: \*Michael J. Wilhelm  
\* Jeff Cohen  
Mr. Bernie Swartwood, Pike County Communications  
Mr. Marty Hedgelon, Wayne County E911 Coordinator

\*via electronic mail

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<sup>1</sup> *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, FCC 06-25 (rel. Mar. 8, 2006) ("Order").

**REPORT OF SOUTH CANAAN  
CELLULAR COMMUNICATIONS COMPANY, L.P.**

Due August 1, 2006

Pursuant to the Commission's *Order*,<sup>1</sup> South Canaan Cellular Communications Company, L.P. ("South Canaan") following report on its progress in achieving the goal of 95% penetration of ALI-capable handsets among its subscribers.

**(1) Number and status of Phase II requests received from PSAPs (including those the carrier may consider invalid):**

South Canaan has received a valid Phase II request from Pike County and provides Phase II service to this county. South Canaan initiated the provision of Phase II services to its Pike County service area on February 28, 2005. The Company has not received a Phase II request from Wayne County.<sup>2</sup>

South Canaan has three sites within its service territory in Pike County, in areas served by ambulance companies in Monroe County (not within its service territory) which are therefore programmed to send E911 Phase II information to a Monroe County PSAP.<sup>3</sup> These sites are currently configured to the Monroe County E911 Center and operating properly.

**(2) The dates on which Phase II service has been implemented or will be available to PSAPs served by its network:**

South Canaan initiated the provision of Phase II services to Pike County on February 28, 2005. South Canaan Cellular is transmitting Phase II data to the Wayne County PSAP today, although the Wayne County PSAP is not yet Phase II compliant, so does not process it.

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<sup>1</sup> *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, FCC 06-25 (rel. Mar. 8, 2006) ("*Order*").

<sup>2</sup> South Canaan misstated in prior reports that it had not received a Phase I service request from Wayne County. Phase I service was initiated in Wayne County on April 26, 2006. An initial request for Phase I service was initiated by the Commonwealth of Pennsylvania in August, 2005; Wayne County requested deferral of South Canaan's planned March, 2006 deployment to accommodate its scheduling requirements.

<sup>3</sup> South Canaan inadvertently overlooked reporting receipt of a request from Monroe County for Phase II service dated August 26, 2005. Although Monroe County is outside South Canaan's authorized service area, the Monroe County E-911 Center provides emergency services to portions of Pike County, which is within South Canaan's service area. South Canaan worked with Monroe County authorities and, as reported, provides Phase II service through the Monroe County E-911 Center. That service initiated on March 26, 2006.

**(3) The status of its coordination efforts with PSAPs for alternative 95% handset penetration dates**

South Canaan continues to coordinate regularly with the PSAPs for both Pike and Wayne Counties. Both administrators have been informed that an extension of the 95% handset penetration date has been granted by the Commission, and open channels of communications exist to ensure that any new or developing concerns are addressed.

**(4) Efforts to encourage customers to upgrade to location-capable handsets:**

South Canaan continues its program of regularly reminding customers of the benefits associated with upgrading handsets through billing inserts and print advertising, emphasizing that location information will not be available to emergency service providers unless the customers transition to CDMA ALI-capable phones. The company also continues its aggressive upgrade/trade-in program which offers two models of compliant handsets to postpaid customers without any cost to the subscriber, as well as other popular handset models at heavily discounted prices (averaging a 35% discount for 1-year agreements and a 74% discount for 2-year agreements).

The Company also continues to run two significant promotions to attract new business and encourage handset upgrades. First, South Canaan has a “Test Drive” campaign which would allow analog handset users to try ALI-capable digital handsets with no phone or local wireless service cost for 30 days. At the end of the promotion period, the trial phone must be returned or the customer will incur regular cellular service expenses per the trial service application agreement. Secondly, the Company offers a prepaid promotion where a free ALI-capable handset is provided with the purchase of a \$50 value pre-paid airtime card and payment of a \$20 activation fee.

**(5) Percentage of customers with location-capable phones:**

Currently, approximately 81.8% of South Canaan direct customers utilize compliant phones<sup>4</sup>

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<sup>4</sup> Approximately 50% of the system's users are TracFone resale customers.

**(6) Status in achieving compliance and whether it is on schedule to meet the revised deadline**

**In its initial report under** the *Order's* requirements, South Canaan adopted the following interim penetration goals:

May, 2006	78%
July, 2006	80%
October, 2006	83%
December, 2006	95%

Having met its July, 2006 goal, South Canaan reports that it anticipates meeting its next interim goal of 83% penetration by the end of October, 2006.

### DECLARATION OF CAROLYN COPP

I, Carolyn Copp, President of SCCI, LLC, the General Partner of South Canaan Cellular Communications Company, L.P., do hereby declare under penalty of perjury that I have read the foregoing "Report of South Canaan Cellular Communications Company, L.P., Due August 1, 2006" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

28 July 2006  
Date

Carolyn Copp  
Carolyn Copp